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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 12-0199 EMC
	)	
Plaintiff,	)	STIPULATION AND <del>[PROPOSED]</del>
	)	ORDER EXCLUDING TIME UNDER
v.	)	THE SPEEDY TRIAL ACT, 18 U.S.C. §
	)	3161 <u>ET SEQ.</u>
CALVIN LAWRENCE,	)	
	)	
Defendant.	)	
_____	)	

Plaintiff United States of America, by and through its attorney of record, and defendant Calvin Lawrence ("defendant"), by and through his attorney of record, hereby stipulate as follows:

1. On April 25, 2012, defendant appeared before the Honorable Edward M. Chen, United States District Judge, and the matter was continued to May 16, 2012 at 2:30 p.m. For the reasons stated in open court on April 25, 2012, and with defendant's consent, the Court excluded time under the Speedy Trial Act from April 25, 2012 through May 16, 2012 to provide the defense lawyer with additional time for investigation and for effective preparation.

3. The parties stipulate and agree that this matter should be continued to May 16, 2012 at 2:30 p.m. and that the failure to grant such a continuance would unreasonably deny counsel the

1 reasonable time necessary for effective preparation, taking into account the exercise of due  
2 diligence. The parties further stipulate and agree that the time from April 25, 2012 through May  
3 16, 2012 should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C.  
4 § 3161(h)(7)(A), on the basis that the ends of justice are served by taking such action which  
5 outweigh the best interest of the public and the defendant in a speedy trial and also under  
6 subsection (B)(iv) for effective preparation of counsel, taking into account the exercise of due  
7 diligence.

8 Dated: April 26, 2012

Respectfully submitted,

10 MELINDA HAAG  
United States Attorney

11 \_\_\_\_\_/s/  
12 DEBORAH R. DOUGLAS  
Assistant United States Attorney

14 Dated: April 26, 2012

15 \_\_\_\_\_/s/  
ELIZABETH FALK  
Assistant Federal Public Defender  
Attorney for Defendant Damon L. Griggs

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA, )

14 Plaintiff, )

15 v. )

16 CALVIN LAWRENCE, )

17 Defendant. )  
18 \_\_\_\_\_ )

No. CR 12-0199 EMC

ORDER EXCLUDING TIME UNDER THE  
SPEEDY TRIAL ACT, 18 U.S.C. § 3161 ET  
SEQ.

19 GOOD CAUSE APPEARING, as the Court found on April 25, 2012, and based upon the  
20 parties' stipulation, IT IS HEREBY ORDERED that the time from April 25, 2012 through May 16,  
21 2012 shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C.  
22 §§ 3161(h)(7)(A) and (B)(iv), to provide the defense lawyer with additional time for investigation  
23 and for effective preparation. The Court finds that (A) failure to grant the continuance would  
24 unreasonably deny defendant the reasonable time necessary for effective preparation, taking into  
25 account the exercise of due diligence; and (B) the ends of justice served by the continuance

26 //

27 //

1 outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C.  
2 § 3161(h)(1)(7)(A) & (B)(iv).

3  
4 **IT IS SO ORDERED.**

5  
6 Dated: April <sup>30</sup> \_\_, 2012

